

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
MEMPHIS DIVISION**

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IN RE REGIONS MORGAN KEEGAN  
SECURITIES, DERIVATIVE and ERISA  
LITIGATION

This Document Relates to:

*In re Regions Morgan Keegan Closed-End  
Fund Litigation*

**No. 2:07-cv-02830-SHM-dkv**

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) Case No: 2:09-md-2009-SHM  
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**REPLY MEMORANDUM OF LAW IN SUPPORT OF MOTION TO DISMISS OF  
CARTER E. ANTHONY**

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**REPLY OF CARTER E. ANTHONY IN SUPPORT OF MOTION TO DISMISS**

For reasons set forth in the briefs of co-defendants filed August 12, 2011, and in particular the brief filed on behalf of ALLEN B. MORGAN, JR., J. KENNETH ALDERMAN, BRIAN B. SULLIVAN, JOSEPH T. WELLER by S. Lawrence Polk of Sutherland Asbill & Brennan, LLP, Anthony moves for dismissal of claims against him. Plaintiffs have articulated no particulars to support a claim against Mr. Anthony, and have not alleged material misstatements or omissions in the offering documents during his tenure with Morgan Asset Management. Further, Plaintiffs have failed to allege facts to infer scienter as to Mr. Anthony and have failed to state a claim for control person liability under either § 15 of the 1933 Act or § 20(a) of the 1934 Act.

DATED this 12<sup>th</sup> day of August, 2011.

Respectfully submitted,

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/s/ R. Hal Meeks, Jr.

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically filed the within and foregoing **Pleading** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

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